Before the FEDERAL COMMUINCATIONS COMMISSION

DA 25-219 Released: March 12, 2025
RE: DELETE, DELETE, DELETE
GN Docket No. 25-133

Comments Due: Friday, April 11, 2025

SUMMARY:

With this filing, Turbo Technical Services ("TTS") makes comment in the above noted proceeding, requesting Commission consideration of deletion or modification of specific Rules and Regulations as outlined in the Public Notice. TTS has been involved in FCC application and licensing process since 1981 and has filed thousands of applications for hundreds of clients for AM, FM and FM translator stations and modifications. Their extensive experience with FCC processes gives them a unique and real-world view of the impact of Commission Rules and Regulations.

COMMENT:

TTS requests modification of Section 74.1232(e) regarding Primary station support of non-fill in translators outside the protected contour. Specifically, this rule states "*An FM translator station whose coverage contour goes beyond the protected contour of the commercial primary station shall not receive any support, before or after construction, either directly or indirectly, from the commercial primary FM radio broadcast station."* TTS proposes this language be revised to permit Primary stations to reimburse translator licensees for reasonable operating expenses incurred.

Obviously these rules are decades into the past century, and reflect a time when local translator associations were providing service to rural areas outside the primary station coverage. Those translator owners had the ability to raise monetary support from the local listeners because of the scarcity of radio programming. That has long since been obscured with the vast availability of media transmissions and the costs for outlying translators have only risen. Permitting the primary station to provide reimbursement of operational costs would ensure those translators to continue to bring a diversity of programming to rural areas.

A thorough review of this is hereby encouraged.

Respectfully Submitted

Jim Turvaville, Owner
Turbo Technical Services